

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
(Richmond Division)**

ANGELA ENGLE HORNE,

Plaintiff,

v.

Civil Action No. 3:16cv92

WTVR, LLC, d/b/a CBS 6,

Defendant.

**MOTION TO DECLARE PLAINTIFF A PUBLIC  
OFFICIAL AND/OR A LIMITED PURPOSE PUBLIC FIGURE**

NOW COMES Defendant, WTVR, LLC, d/b/a CBS 6 (“WTVR”), by counsel, and moves this Court to declare Plaintiff a public official and/or a limited purpose public figure subject to the requirement to prove “actual malice” set forth in New York Times v. Sullivan, 376 U.S. 254 (1964). The Plaintiff was Director of Budget and Finance for the Prince George County school system, and her duties and responsibilities associated with this position are such that they invite and appear to invite public scrutiny. The Plaintiff was also a participant in controversy surrounding how she had been hired in violation of clear and long-standing Virginia law and she is a limited purpose public figure for the purpose of reporting on the details of the School Board’s actions. The grounds for this Motion are more particularly set forth in Defendant’s Memorandum in Support of Motion to Declare Plaintiff a Public Official and/or Limited Purpose Public Figure filed simultaneously herewith.

Dated: November 22, 2016

Respectfully submitted,

/s/

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**CERTIFICATE OF SERVICE**

I hereby certify that on the 22nd day of November, 2016, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing to all counsel of record.

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